



GROSSMAN LLP  
ATTORNEYS AT LAW

745 Fifth Avenue, 5th Floor, New York, NY 10151  
T. 646-770-7445 F. 646-417-7997

GROSSMANLLP.COM

January 29, 2021

**VIA ECF**


Hon. Lorna G. Schofield  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

By **February 8, 2021**, Plaintiff shall file a response to this letter not to exceed three single spaced pages.

SO ORDERED.

Dated: February 1, 2021  
New York, New York

Re: ***Joint Stock Company "Channel One Russia Worldwide v. Russian TV Company, Inc., et al., Case No. 18-cv-2318 (LGS)***



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

We write on behalf of Defendants under Section I.D.3 of the Court's Individual Rules and Procedures for Civil Cases to respectfully request the Court's permission to file certain exhibits related to Defendants' Summary-Trial Memorandum in redacted form and under seal.

Defendants seek the following sealing and redactions, which are narrowly tailored to maintain the confidentiality of customer information:

- Sealing: Exhibits 4 and 8 to the Declaration of Steven Rudik; and
- Specific Redactions: Exhibit 7 to the Declaration of Steven Rudik.

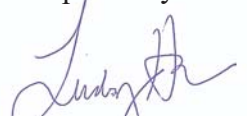
These redactions are narrowly tailored to maintain confidentiality of the identity of subscribers to Defendant Russian Television Company, Inc. *See, e.g., Tyson Foods, Inc. v. Keystone Foods Holdings, Ltd.*, No. 1:19-CV-010125 (ALC), 2020 WL 5819864, at \*2 (S.D.N.Y. Sept. 30, 2020) (motion to file exhibits under seal granted where exhibits contained "confidential and sensitive business information," including "customer lists").

Defendants also file the following exhibits under seal based solely on the confidentiality designations of Plaintiff and Kartina Digital GmbH:

- Sealing: Exhibits B, C, D, E, G, H, L, and M to the Declaration of Lindsay E. Hogan, Esq.

Defendants take no position on these designations.

Respectfully submitted,



Lindsay E. Hogan

cc: All Counsel (via ECF)